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**SECRETARY, BOARD OF
OIL, GAS & MINING**

February 23, 2014

To Bradford Wazaney, Environmental Protection Specialist, Bureau of Indian Affairs, Uintah and Ouray Agency, P.O. Box 130 (988 South 7500 East), Fort Duchesne, Utah 84026;

Phone: (435) 722-4300; Telefax: (435) 722-2323.

cc: Governor Gary Herbert, Energy Department

cc: Rob Bishop, U.S. Representative 1st District

cc: Ruland Gill Jr., Utah Board of Oil, Gas and Mining

I'm writing to present my concerns about the Avintaquin Canyon Exploration and Development Project proposed by the Berry Petroleum Company (now owned by Linn Energy).

The areas involved in this exploration impede on the recreational and environmental importance of the Timber, Avintaquin, and Strawberry River Canyons. In this case, 640 wells are being proposed to go into these canyons. These are canyons of state importance, deliberately marked by a brown colored highway sign, indicating "a point of recreational interest".¹ I ask you to thoroughly review the business need for Berry Petroleum to drill more mines at this time, increase trucking levels through the Uintah Mountains, and add oil output to existing reserves.

Berry Petroleum currently contributes 1% of oil revenues to the state's overall revenues and 3/1000% of natural gas revenues². Its current wells could provide more output. Additionally, there is little disposition to accept more of the oil product that comes out of the Uintah Basin wells. Salt Lake's refineries are at capacity, having to turn away trucks already, or accept them at a significant pricing discount. With processing capabilities and/or a refinery in the eastern Uintah Basin, Utah's oil could be sold at a higher price, exported as crude oil or with wax removed. Trucks that are currently travelling through the Uintah Mountains could instead travel east to Duschene and processed there for use in Utah and other areas in need. These improvements in eastern Duschene county would add much needed infrastructure in the area with direct financial benefits from oil mining. Trucks and pipelines would not have to travel from eastern Utah to the Salt Lake Valley, further contributing to the valley's air quality problems and disturbing private lands in Summit and Wasatch Counties.³

I also ask you to remove all State lands from the Avintaquin Project. The cost of tampering with pristine, well-loved canyons may seem like a good idea for mining revenues, but there is likely to be negative backlash from the voters as mining expansion travels further west, as it does with this project. The state receives a royalty from all mining activity, perhaps that can enough in this case, enabling state forests to be removed from the project. Can exploration be re-scoped – with the removal of all segments within T4SR8W – and still meet Tribal interests and protect current recreation activities?

¹<http://www.trafficsign.us/signcolor.html>

² https://oilgas.ogm.utah.gov/Statistics/PROD_Oil_field.cfm

³<http://utah.sierraclub.org/content/salt-lake-oil-refinery-expansion>

Additionally, there are many unlisted areas of research in the Bureau of Indian Affairs' Scope document. These questions are important to consider to ensure that the recreational and pristine mountain and river environments that exist there now will not be irreparably damaged.

When is this testing to begin and for what duration of time?

Where exactly where the proposed "exploration drilling" occur?

How extensive is the drilling initially?

What are the ingress/egress points?

Will the oil be taken out by pipeline? If so, where will pipelines run?

Are these winding canyons adequate for trucks to safely collect liquid by-products from well sites?

What is the truck traffic and when? How will this be mitigated through existing residential and resort areas located at the bottom of the proposed drilling area (Strawberry Pinnacles)?

Are the roads and bridges suitable for 80,000-200,000 pound loads coming out of the well sites?

Where will the gas processing plant be located?

The Report to Governor 2012 showed Mining to be the state's fastest growing sector. However, the document also states, "The energy boom is expected to slow as oil prices stabilize, leading to a -3.1% decline in mining jobs, where this sector has grown strongly the past few years, often leading the economy. "⁴

Since the state is expecting a levelling-off in this sector, why not allow that to occur before starting to drill additional wells?

Have you seriously considered what will be left once the trucks, equipment, etc have impacted these lands?

For any financial impact that will be made due to this new exploration, the mining industry is still the smallest industrial sector in the state. Is it really worth it to annihilate loved lands to make these additional contributions?

"Energy is the smallest industrial sector in Utah, and while its 1,210 new jobs in 2011 were small in quantity, it represents a growth rate of 11.7%. Nearly all of the gains were in the oil and gas sector in the Uintah Basin."⁵

And for the myth that the county's residents benefit from such oil exploration, the Report to the Governor states, "Personal Income declined in all but six counties in 2009. Oil and gas dependent Uintah County had the largest decline (-14.1%)."⁶

Please strongly consider whether this project is really needed.

Sincerely,
Alexandra Ziesler
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⁴http://governor.utah.gov/DEA/ERG/ERG2012/2012_ERG_11_20_2012.pdf

⁵Ibid.

⁶Ibid.